

California Environmental Protection Agency
Enforcement Assessment Survey Results

1. What should be the focus of an enforcement program?		#	%
a.	Achieve compliance; enforce the law	52	34.4
b.	Improve and protect public health and the environment (prevent pollution, reduce emissions, stop illegal activity); find out from research division which pollutants are the worst.	26	17.2
c.	Education and training	12	7.9
d.	Establish priorities based on higher risk by population location, or what they are handling; set priorities (to be revised periodically).	11	7.3
e.	Provide a deterrent; emphasize criminal actions	8	5.3
f.	Address the problem of low-fine levels - need high, stiff penalties	5	3.3
g.	Work together effectively with other agencies or programs, and businesses.	4	2.6
h.	Sense of fairness from the community and opportunity for input; level playing field. Simple to use while protecting due process rights of citizens.	4	2.6
i.	Target willful violators; monitor and permit sites based on their level of compliance	4	2.6
j.	Rule effectiveness studies	3	2.0
k.	Streamline enforcement process, reduce admin.workload/minimize costs	3	2.0
l.	Enforcement follow-up	2	1.3
m.	Increase field presence and inspections	2	1.3
n.	Simplify regulations / make sure they achieve desired effect	1	0.7
o.	Make an impact that is exciting, challenging and brings pride	1	0.7
p.	Accept complaints from citizens or other agencies.	1	0.7
q.	Have standardized policies and procedures - how to do an inspection	1	0.7
r.	Expand voluntary disclosure process	1	0.7
s.	Make it a priority to ensure funding so that you can have a dedicated cadre who can focus on enforcement	1	0.7
t.	Get tougher with County Ag. Commissioners	1	0.7
u.	Investigate illness and exposure to high toxicity pesticides	1	0.7
v.	Focus on priorities outlined in the watershed management initiative	1	0.7
w.	Structural changes at the top - make the Board a Department	1	0.7
x.	Get rid of overriding mandatory minimum penalties	1	0.7
y.	Act promptly and thoroughly	1	0.7
z.	AG Issue is interesting - Title V permits - hard for local entities to enforce politically (ARB & Cal/EPA should step in)	1	0.7
aa.	ED should not focus on how much we are going to get, let lawyers deal with penalties.	1	0.7
bb.	Identify by process whether an area needs monitoring	1	0.7
Total		151	

2. How can we improve the efficiency and/or effectiveness of your BDO's enforcement program?		#	%
a.	Increase education, training, staffing and resources	25	16.1
b.	Improve efficiency and consistency in enforcement process (cut red tape, simplify internal reports); streamline and clarify regulations (and statutes if possible); give inspectors greater leeway; increase management support	23	14.8
c.	Improve data management systems; use measures of performance to evaluate the success or failure of our program areas and to redirect our efforts among those areas, share enforcement data between BDOs and local agencies; explore other information technology options	12	7.7
d.	Partner with other entities, establish better relationships with other agencies, and local attorneys; increase interagency cooperation	7	4.5
e.	Issue infraction citations with a ticket book like officers use, work more directly in partnership with AQMD staff.	6	3.9
f.	Have legal counsel available throughout the state, to field offices and locals; more prosecutions by locals; sign a master contract for Administrative Law Judges which state and local programs can use	6	3.9
g.	Improve internal coordination, possibly create newsletter.	5	3.2
h.	Target limited resources to high priority enforcement areas; focus on emission reductions.	4	2.6
i.	Reassess policies and ideas, brainstorm and take a proactive approach; get away from beancounting (not all enforcement cases are equal)	4	2.6
j.	Issue press releases for significant enforcement actions; inform the public	3	1.9
k.	Keep an eye on emerging technologies to make detection easier	3	1.9
l.	Strengthen penalties and apply more criminal charges; increase AG civil penalties	3	1.9
m.	Determine how you measure compliance/performance/community health	3	1.9
n.	Spend more time on negotiations	2	1.3
o.	Identify and establish clear lines of responsibility for enforcement authority	2	1.3
p.	Use public disclosure to stimulate action; post violation information and monitoring data on the internet so the public and government can see action taken or not taken	2	1.3
q.	Have the Cal/EPA name on letterhead, business cards, etc.	2	1.3
r.	SEP's	2	1.3
s.	Make it mandatory that counties issue fines for all the violations they find per individual affected.	2	1.3
t.	Refocus staff on primary goals /enhanced targeting	2	1.3
u.	Focus on unregulated facilities, use the internet, and yellow pages	2	1.3
v.	Address problems with legal staff - attorneys reassigned/ turnaround time	2	1.3
w.	Sponsor and/or endorse leg proposals designed to address gaps in statutory authority; potential legislation is needed to allow ARB more authority to do more when districts aren't.	2	1.3
x.	Less frequent regulatory overview, more flexibility in the laws.	2	1.3
y.	Cal/EPA needs to clearly articulate what the goal of environmental enforcement is.	1	0.6
z.	Restore the funds and resources to the Mexico border program	1	0.6

aa.	The Task Force Support and Special Investigations Branch (TFSSIB) should be integrated back into SCD.	1	0.6
bb.	Increase awareness and responsibility	1	0.6
cc.	Focus more on solving the problem and less on blaming	1	0.6
dd.	Implement electronic DMR Process	1	0.6
ee.	Spend more time on headquarters Inspections	1	0.6
ff.	Standardize penalty amounts for common violations.	1	0.6
gg.	Meet with facility before we issue an enforcement order.	1	0.6
hh.	Resurrect Enforcement Initiative	1	0.6
ii.	Provide appropriate infrastructure.	1	0.6
jj.	Provide mandatory penalties for programs other than NPDES such as Non Ch. 15 where DMR's historically languish with little to not oversight.	1	0.6
kk.	Get rid of the Board (board members)	1	0.6
ll.	DPR needs to take action to suspend or condition applicator licenses and permits when a substantial violation has occurred	1	0.6
mm.	Conduct more inspections	1	0.6
nn.	Don't generate lots of NOVs that don't get resolved and create a backlog	1	0.6
oo.	Copy ARBs structure, there is a certain culture to enforcement	1	0.6
pp.	Take more cases, or at least offer to take one per year that any AQMD refers	1	0.6
qq.	Focus on source categories	1	0.6
rr.	ARB and the districts need to develop a common understanding of what cases should be referred to prosecutors	1	0.6
ss.	Develop a score card to review suggestions	1	0.6
tt.	Allow LEAs to issue fines and penalties like the water boards	1	0.6
uu.	Categorize violations as major and minor	1	0.6
vv.	AEO is a good idea for other programs	1	0.6
ww.	Reorganize DTSC enforcement, having one enforcement program instead of	1	0.6
xx.	Improve complaint process	1	0.6
yy.	Expedited, concise, and stepwise procedure for accessing circuit prosecutor to handle formal enforcement actions if and when the local agency cannot settle violations administratively	1	0.6
zz.	Have long term career track and mobility for enforcement staff to keep people in the field (eg police & fire depts.)	1	0.6
aaa.	Get away from bean counting	1	0.6
Total		155	

3. Can you identify problem areas? What about solutions?			
3A. Problems		#	%
a.	Lack of resources	16	12.3
b.	Regulatory complexity, and clarity. Often too many regs going at once. Ambiguous narrative standards. (Honest operators don't understand multiple regulations). A greater effort must be made to assure that the conditions set forth in permits and other authorizing documents are unequivocal and consistent with current statutes and regulations.	14	10.8
c.	Lack of credibility, respect and strength	8	6.2
d.	Lack of enforcement at the local level. CUPAs have 6 program areas; hazardous waste is only one of their 6 task areas. Counties are not issuing penalties for many violations found. If an LEA does not take enforcement action, CIWMB is limited to taking independent action in situations of "imminent threat". Work for legislative change for the ability of AQMD staff to issue infractions. SCD should work with the CUPAs to help improve their enforcement programs.	7	5.4
e.	Inadequate training; permit writers need to go on inspection and enforcement activities for additional training	7	5.4
f.	Insufficient communication (inc. multi-lingual)	6	4.6
g.	Legal Issues (bottleneck, inadequate assistance, loopholes)	5	3.8
h.	Stationary source enforcement program is non-existent	5	3.8
i.	Not enough flexibility; determining how many inspections you should conduct.	5	3.8
j.	Too many agencies implementing environmental programs causing fragmentation and inconsistency. Too much competition between people and sections. Roles need to be defined. (ex. If we have contamination do I go to Water Board or DTSC?). Silo effect, media or program specific thinking	5	3.8
k.	Managerial guidance - micro management; not enough support, etc.	5	3.8
l.	Vapor Recovery	4	3.1
m.	Lack of uniformity and consistency	4	3.1
n.	Lack of adequate and current data	3	2.3
o.	Ineffective field staff. A growing number of field positions are unable to go into the field, yet we can't move those individuals into to other positions.	3	2.3
p.	Mandatory penalties are too severe and burden public entities.	3	2.3
q.	Underutilization of staff. There are too many people doing the same programs year after year that don't result in cleaner air. ALJ Contract may not be renewed. Without it, smaller rural counties are not going to go enforcement actions because they don't have the upfront costs.	2	1.5
r.	Extensive appeals; hearing process is too convoluted.	2	1.5
s.	There are various industries that have not been adequately regulated by DTSC.	1	0.8
t.	Co-mingling of funds and cross utilization of staff for different program elements (County Ag Commissioners have programs they implement for Food and Ag)	1	0.8
u.	Bi-furcated staffing. The same people who are doing permitting are doing enforcement.	1	0.8

v.	Aging workforce - staff cannot be field certified because of OSHA regulations.	1	0.8
w.	Task Force Support Special Investigations Branch has gotten new equipments, and converted positions to senior techs which are higher paid. Others with more complicated jobs are paid less.	1	0.8
x.	Permitting division needs to see themselves as regulators	1	0.8
y.	1-800 number is not widely known	1	0.8
z.	Consultants aren't doing their jobs so facilities get penalized	1	0.8
aa.	Delay between identification of a violation and the initiation of an enforcement action.	1	0.8
bb.	Lack of mandatory penalties for violations found in inspections	1	0.8
cc.	Lack of deterrents	1	0.8
dd.	ARB is not responsive enough - just passes back to district. Make sure the district is responding adequately.	1	0.8
ee.	Source testing needs to be a priority	1	0.8
ff.	Self pollution of school buses	1	0.8
gg.	Smoking passenger cars (study done by Lovelace institute found that white smoke is worse than diesel.	1	0.8
hh.	The portable equipment registration program is a huge loss.	1	0.8
ii.	Contractor or private citizen illegal burning overwhelms our efforts at times - prevent and prosecute.	1	0.8
jj.	Not enough criminal prosecutions	1	0.8
kk.	Portable Engine Registration Program (PERP)	1	0.8
ll.	More can and should be done to assure that regulated facilities maintain adequate resources to fund the inevitable costs of facility closure and post-closure care.	1	0.8
mm.	Manifest enforcement efforts should increase.	1	0.8
nn.	Underpayment of mill tax resulting from non-ag resellers which are not required to register with DPR	1	0.8
oo.	We need a standardized format to make referrals & reports defensible	1	0.8
pp.	Our board doesn't speak with one voice	1	0.8
qq.	Agencies rarely refer cases for prosecution to the DA's office	1	0.8
rr.	DPR doesn't take action when pesticides mix with tractor dust and make unbreatheable air, they say its ARBs issue. ARB says its an Air District issue, and so on.	1	0.8
Total		130	

3B.	Solutions	#	%
a.	Cal/EPA needs to take the lead to unify all the BDOs under the umbrella; more leadership and communication; bring silos together; we need Cal/EPA name on our letterhead, business cards, etc. (Ex. Cal/EPA - Water Quality Branch). Share resources. Coordinate efforts with other Cal/EPA enforcement programs	9	13.0
b.	Find a creative way to increase efficiency and effectiveness; prioritize; streamline review process; simplify laws and regs; keep reports nice and short.	8	11.6
c.	Improve information management systems including GIS; improve standards so they are measurable and meaningful; ask how we reduce the excess emissions brought about by non-compliance; as section mgrs. To identify what staff does and how that reduces excess emissions; increase statewide surface and groundwater ambient monitoring programs. Worry about proper threat. We worry about double walled tanks when there are single walled ones out there which are a worse threat.	6	8.7
d.	Add training opportunities	5	7.2
e.	Apply the CUPA model to solid waste; LEAs should be overtaken by the state agencies. Get CUPA more involved.	3	4.3
f.	Reduce the number of cold cases generated	2	2.9
g.	No new programs	2	2.9
h.	Redirect resources and funding from other areas; more field enforcement.	2	2.9
i.	Hazardous waste program with the CUPAs should revert back to the state.	1	1.4
j.	Implement user friendly whistle blower program.	1	1.4
k.	Move non-rated field staff out of field positions	1	1.4
l.	Joint enforcement tracking system	1	1.4
m.	Mandatory requirement for counties to issue violations.	1	1.4
n.	Look at a magnitude of violations. Evaluate size and severity of problem.	1	1.4
o.	Advertise 1-800 number.	1	1.4
p.	Revise H&SC 25192 to allow more penalties to be retained by investigative agencies.	1	1.4
q.	Get rid of the violators right to a public hearing	1	1.4
r.	Develop penalty and fee collection capabilities.	1	1.4
s.	Take a risk based approach to enforcement actions.	1	1.4
t.	Add more multi-lingual staff	1	1.4
u.	Get the flexibility to assign a period of time for violators to comply with regulations.	1	1.4
v.	Make consultants liable	1	1.4
w.	Give supervisors the authority to sign off on orders for smaller penalties	1	1.4
x.	Work with the economists in Sacramento using BEN	1	1.4
y.	Communicate more with LEAs, LIAs, and CUPAs	1	1.4
z.	Focus more on recruitment activities and staff composition	1	1.4
aa.	Create a good balance in your sections/teams	1	1.4
bb.	Do rule effectiveness studies	1	1.4
cc.	Focus on sectors where compliance rates are bad.	1	1.4
dd.	Remember you work for the public, not your BDO.	1	1.4
ee.	ARB needs to mount a strike force in cooperation with the districts to find unregistered equipment an non-complying equipment	1	1.4

ff.	Perform a study on portable equipment compliance.	1	1.4
gg.	Clarify ATCMs	1	1.4
hh.	Part-time or short-time personnel exchange is one possible opportunity to get	1	1.4
ii.	Enforcement involvement in the rule writing process to ensure that rules are clear and enforceable in the field.	1	1.4
jj.	Develop relationships with prosecutors	1	1.4
kk.	Direct settlement money to support the enforcement program	1	1.4
ll.	Permit writers should consult with enforcement staff before and during permit writing process	1	1.4
mm.	Circuit enforcement group of attorneys who assist various jurisdictions	1	1.4
nn.	Agencies in oversight positions need to take more responsibility	1	1.4
Total		69	

4. How can we go about identifying and developing new programs?		#	%
a.	Streamline and fix existing programs before adding new ones; new programs mean new regulations; look at what works in other programs; look at regs in development, and make sure they are enforceable.	18	21.2
b.	Have more task forces and working groups and ensure management supports them; more cross-media efforts; utilize existing staff; have joint inspections	10	11.8
c.	Brainstorm at staff level, management level and enforcement roundtables; look at history, trends, and legislation - look through blue book and see what we aren't enforcing; share successes and support for implementing new tools; look for best management practices to follow	7	8.2
d.	Communicate with people through efforts like the enforcement assessment to identify problem areas and areas of improvement; surveys.	5	5.9
e.	Consider contracting out fee and bill collections	2	2.4
f.	Focus on night and weekend inspections and complaints	2	2.4
g.	Forum for submitting new ideas - Coffee with EO	2	2.4
h.	Get compliance rates and the set goals using problem solving scheme; seek out non-compliance.	2	2.4
i.	Create a structures way to get feedback from the field.	1	1.2
j.	New programs should be internal and bubble up to the Board. New programs need to be developed by management and brought forth to the Board.	1	1.2
k.	DTSC has already developed new programs. The Tiered Regulatory System contains a tiered permit program where hazardous waste is treated differently than universal waste. This system is better than the old "one size fits all" permit system. Each tier has different expectations.	1	1.2
l.	New enforcement initiatives should be tied to current and emerging public health concerns.	1	1.2
m.	Change the dynamic of what goes on. People are doing the same thing year after year regardless of success.	1	1.2
n.	Mandate and fund separate enforcement or compliance units.	1	1.2
o.	Increase resources, and lower number of expectations for enforcement.	1	1.2
p.	There are huge needs for funding adequate sewage and storm water collection and treatment systems.	1	1.2
q.	Re-examine Non-point source program and better prioritize.	1	1.2
r.	Talk to operators of businesses about what is needed and what is useless.	1	1.2
s.	Add a 3- Strikes program	1	1.2
t.	Try to keep people from having accidents	1	1.2
u.	Identify new areas of development, target people within that area.	1	1.2
v.	Begin assistance visits, not just inspections.	1	1.2
w.	Form a committee to look at the infrastructure of regulations being put out	1	1.2
x.	Question when one facility has 14 different permits, and 3 or 4 of them are addressing the same thing.	1	1.2
y.	Target high priority sites for the Cal ARP program.	1	1.2
z.	Be flexible with our work, plan bean counts.	1	1.2
aa.	Use indicators, tools, data and information effectively.	1	1.2
bb.	We're tied to the federal purse strings.	1	1.2
cc.	Already involved in Partnership 2000	1	1.2

dd.	The State should providing for roving legal support for LEAs	1	1.2
ee.	Solicit a request for public input on all BDO web sites.	1	1.2
ff.	Include in a newsletter, ideas selected	1	1.2
gg.	Focus on the biggest environmental concerns	1	1.2
hh.	Work with the districts on stationary source categories	1	1.2
ii.	Squeaky wheels. Pay attention to who's complaining and about what	1	1.2
jj.	Any enforcement program should have direct fining authority	1	1.2
kk.	Have the authority to write tickets and assess fines at staff level	1	1.2
ll.	Revisit our mandates and compare with changes in the society; most of the laws and regs enforced are decades old	1	1.2
mm.	Data analysis to identify weakness	1	1.2
nn.	CUPAs could use AEOs in their other program areas	1	1.2
oo.	Survey other states on what they determine to be successful programs	1	1.2
pp.	Coordinate Cal/EPA's programs better; bring the BDOs together; make them all	1	1.2
qq.	Programs should get input from local activists, idustry and the medical field; create health study	1	1.2
rr.	60% of DPRs money should go to research organic methods of growing crops	1	1.2
ss.	Set up more air monitoring	1	1.2
Total		85	

5. How do you measure the success of an enforcement program?		#	%
a.	Increase in compliance (reduction in number and severity of violations). Is there an end to the problem?	37	37.0
b.	Status of the environment (less pollution, cleaner water, etc.); improvements in monitoring data. Is the enforcement program meeting the goal of the law or regulation?	13	13.0
c.	Number and size of spills/discharges/releases	4	4.0
d.	Number of inquiries related to improper handling or disposal of hazardous waste.	4	4.0
e.	Number of inspections conducted	3	3.0
f.	Amount of Penalties	2	2.0
g.	Success in formal enforcement cases.	3	3.0
h.	Look at activities and results	3	3.0
i.	Number of deaths related to improper handling or disposal of hazardous waste.	3	3.0
j.	Number and severity of illnesses related to exposure.	2	2.0
k.	A prevailing sense of fairness.	2	2.0
l.	Data analysis for investigation priorities	2	2.0
m.	Groundwater, surface water, and air monitoring of hazardous materials to determine if these substances are present, and trends in their concentration over time.	2	2.0
n.	Use a good complaint system for the public and regulated community; track complaints over time	2	2.0
o.	Citizen law suits for federal waters.	1	1.0
p.	Negative BCPs that reflect a decrease in the need for enforcement personnel.	1	1.0
q.	Support from honest business groups.	1	1.0
r.	Type of enforcement actions taken	1	1.0
s.	Number of emergency responses to incidents involving hazardous waste	1	1.0
t.	Prevention of new superfund sites	1	1.0
u.	More numerous small fines before they become gross polluters.	1	1.0
v.	Measure progress (USEPA uses METRICS)	1	1.0
w.	How many inspections per inspector.	1	1.0
x.	Amount of money permittees must put away to ensure they will not leave some superfund site.	1	1.0
y.	Tracking the nature of violations (working on violation tracking system)	1	1.0
z.	Outcome (ex. Measured by outcome are Federal GRPA, and Cal/EPA's EPIC and RPMS projects)	1	1.0
aa.	Review the whole thing - revamp the mission. Think outside the box.	1	1.0
bb.	Cross media enforcement	1	1.0
cc.	Success of inspections conducted - are they thorough and complete?	1	1.0
dd.	Expanded self-certification program backed by rigorous audits, as suggested by CPR.	1	1.0
ee.	Measure rate of involvement and being part of a successful prosecution as a success	1	1.0
ff.	Survey stakeholders	1	1.0
Total		100	

6. Is there an area that has not been addressed by this interview that should be?		
	#	%
a. Communication, publicize our success. What is the enforcement philosophy from agency? Is this message being projected throughout the BDOs? Recognize the value of cross media cooperation	7	9.5
b. Re-organization may be necessary; consolidate options of the Water Board, DTSC, Fire Marshal and OES related to the CUPA program elements under Cal/EPA; consolidate state agencies to have less overlap.	5	6.8
c. Data management; companies compliance records should be available through the internet. We need to increase innovation and take advantage of new technology and information; develop a robust adaptive management system where information is collected, compiled, evaluated and used for setting new policy and priorities and then is continually monitored, evaluated and updated based on new information.	5	6.8
d. Do not use enforcement as a means to generate revenues, I.e. a quota system	4	5.4
e. A plan is needed to maintain oversight presence out in the field; enforcement presence is inadequate	3	4.1
f. Designate a few employees to pursue enforcement. The individuals will be oriented towards the enforcement aspects of the inspection process. Have a few employees designated to pursue formal enforcement. Employees should be trained in proper enforcement skills	3	4.1
g. Reward compliant facilities	2	2.7
h. Air cases are under-enforced because the air district goes administratively to get penalties to fund their agency	2	2.7
i. Locals (LEAs and CUPAs) may have a conflict of interest at the local level; allow locals to defer compliance to the State without threat of de-certification	2	2.7
j. Cal/EPA, at agency level, should take over some cases; there is room for improvement for the environmental cases, if Cal/EPA would encourage more statewide prosecutions.	2	2.7
k. We need a system with checks and balances on local decisions not to take enforcement actions.	1	1.4
l. Prevent polluters from bidding on contracts	1	1.4
m. We need a strong, assertive enforcement program. If the company knows we have a policy to issue warning letters instead of violations, they are less likely to be compliant.	1	1.4
n. Go after consultants giving bad information	1	1.4
o. Why not pick several zip codes that are EJ areas for a certain time period and gather all inspection data and have a report detailing all the different inspections and enforcement that was done.	1	1.4
p. Add orientation (agency specific information) for new employees	1	1.4
q. We need more cooperation and coordination between state agencies	1	1.4
r. Keep the brown bag lunches, and inspector training academy.	1	1.4
s. Others should attend ARB's cross media enforcement symposium	1	1.4
t. We have come a long way with clarifying and streamlining the quarterly and annual CUPA report requirements.	1	1.4

u.	Notice to comply, NTC, or a fix-it ticket. We should change our agency name on the fix-it ticket.	1	1.4
v.	Address the misinterpretation of the water code. It's a restriction on the staff to not endorse a product or technology, which limits our ability to help the violator.	1	1.4
w.	Regulations should be clarified to cover an initial doctor visit even if diagnosis is not a pesticide illness.	1	1.4
x.	Investigate better and enforce failure to report pesticide use.	1	1.4
y.	Evaluate regulation title 33 section 6524 - the level of liability insurance required for pesticide applicators is too low.	1	1.4
z.	Allow locals to defer compliance to the State without the threat of de-certification.	1	1.4
aa.	A POST certified investigator should be available to assist local agencies	1	1.4
bb.	Cal/EPA's contract with OAH to provide an ALJ for AEO cases is critical for enforcement at the local level.	1	1.4
cc.	For the short term, you can pick an industry and go out, get them, come back to your silos and then go out and do your own thing. We need to focus on the big picture, the long term benefits.	1	1.4
dd.	Penalties aren't high enough	1	1.4
ee.	Performance measures	1	1.4
ff.	The permit philosophy and the enforcement philosophy should not be mixed	1	1.4
gg.	It would be good to know the effects of ever increasing landfill costs, and the small benefit derived as compared to the illegal dumping and illegal burning cases generated in rural areas.	1	1.4
hh.	A cost benefit analysis with the RWQCB and ARB is long overdue.	1	1.4
ii.	Interagency Personnel Assignments would be a great way for ARB and the districts to develop a better understanding of each others programs	1	1.4
jj.	We need to help the districts to develop more effective complaint-handling procedures	1	1.4
kk.	We need to address what major challenges confront the enforcement programs if CPR recommendations are implemented, and how we can best prepare to meet those challenges.	1	1.4
ll.	Statute binds DTSC (and other agencies) to certain types of enforcement. Other types may be more effective under certain circumstances. For example, DTSC used to have "toxic tickets" for minor fines at lower risk facilities.	1	1.4
mm.	We need to focus on criminal enforcement.	1	1.4
nn.	CIWMB and LEAs should work with Planning Departments and newly regulated industries such as construction and demolition debris facilities to comply with newly adopted regulations	1	1.4
oo.	Some jurisdictions do not have a CUPA; it is important that there is consistent enforcement of hazardous waste regulations in all jurisdictions	1	1.4
pp.	Administrative hearing panel process should be addresses (too lengthy and political)	1	1.4
qq.	USTs, annual notification letters were not sent out on eyear which resulted in poor compliance with annual monitoring & equipment. This resulted in higher enforcement reporting.	1	1.4
rr.	We need management support and tools to do the job	1	1.4

ss.	Do away with self reporting by violators if they are caught lying once	1	1.4
tt.	Overlapping enforcement duties with locals	1	1.4
uu.	Enforcement programs are best left as separate programs in the BDOs.	1	1.4
vv.	Remove local prosecutors from the equation if there is a poor record or no record of taking formal enforcement actions	1	1.4
ww.	The continuous water waste that some farmers allow to happen	1	1.4
Total		74	